

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Case No. 2:22-cv-04027-MDH
)	
v.)	
)	
JOHN HUGO EICKHOFF, JR.,)	
RHONDA KAY EICKHOFF,)	
HOFFMAN ASSOCIATES, LLC,)	
ARIC ELLIOT SCHREINER,)	
COLUMBIA CPA GROUP LLC,)	
JOHN WILLIAM GRAY II, and)	
DAMON THOMAS EISMA, individually)	
and d/b/a DAMON T. EISMA)	
Attorney at Law,)	
)	
Defendants.)	

**REPLY BRIEF IN SUPPORT OF MOTION TO WITHDRAW AND
SUGGESTIONS IN SUPPORT THEREOF**

COMES NOW, Steven E. Holtshouser and Christina Moore¹ of Husch Blackwell LLP, and replies late to the Government's response to the motion to withdraw, as follows:

The Government's response indicated in its paragraph 3 that it did not oppose the request subject to two conditions and cited LR 83.2 in support of the conditions. Although neither condition can be found in the rule, which only requires a showing of good cause, counsel has met the Government's conditions and shown good cause. Specifically, undersigned counsel has provided the Government with Mr. Eickhoff's telephone, email and mailing address. Further, it has advised the Government that Mr. Eickhoff does wish to proceed *pro se* given he is no longer compensating undersigned counsel and is in arrears on a substantial sum. Having recently

¹ As stated in counsel's opening Motion, Ms. Moore is no longer with the firm, but is included in this motion for clarity since she is currently listed as counsel for these Defendants.

communicated with Mr. Eickhoff, undersigned counsel also confirms for this Court that Mr. Eickhoff wishes to proceed *pro se* and not hire substitute counsel. Therefore, the motion to withdraw as to Mr. Eickhoff, to whom the Government has recently issued post-judgment discovery, should be granted.

Finally, as to Hoffman Associates, LLC, an entity which the Government knows has long ceased to exist, there is no requirement or conditions for withdrawing from representation of said entity. The Government also offers no justification for not granting the motion as to Hoffman.

WHEREFORE, Steven E. Holtshouser and Christina Moore of Husch Blackwell LLP, respectfully moves for leave to withdraw from their representation of the Eickhoff Defendants.

Dated: December 9, 2024

Respectfully submitted,

HUSCH BLACKWELL LLP

By: /s/ Steven E. Holtshouser
Christina B. Moore, #53917MO
Steven E. Holtshouser, #33531MO
8001 Forsyth Blvd., Suite 1500
St. Louis, MO 63105
Phone: 314.480.1500 Office
Fax: 314.480.1505 Facsimile
Christina.Moore@huschblackwell.com
Steve.Holtshouser@huschblackwell.com

*Attorneys for Defendants John Hugo Eickhoff, Jr.
and Hoffman Associates, LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served by filing a copy of the same with the Court's electronic filing system this 9th day of December, 2024.

/s/ Steven E. Holtshouser